

CERTIFICATION OF HAZARDOUS WASTE STORAGE FACILITY CLOSURE

Parker Chemical Company, Madison Heights, Michigan

EPA ID No. MID 057676124

Reference: 40 CFR 265.115
Federal Hazardous Waste Management Regulations
Resource Conservation and Recovery Act

Pursuant to the above referenced EPA regulation, this is to certify closure of the hazardous waste storage facility at the Parker Chemical Company plant in Madison Heights, MI, in accordance with the specifications in the approved closure plan dated _____ and approved by MDNR on _____.

Certification by Facility Owner/Operator

(Signature)

Roger F. Walker (Printed Name)
Director of Operations
Parker Chemical Company, Madison Heights, MI

Certification by Professional Engineer

(Signature)

(Printed Name)

Registration No. _____

PARKER CHEMICAL COMPANY

Madison Heights, Michigan

Closure Plan - MID057676124

Part 265
Subpart G

Closure and Post-Closure

265.110 Applicability

Closure - This section applies to the storage of hazardous waste in the drum storage areas.

265.111 Closure Performance Standard

- A. Hazardous wastes in storage will be removed by licensed disposal agents within 90 days after receiving the final volume of hazardous wastes.
- B. The drum storage area will be cleaned with alkaline cleaners for neutralization of any spills. Samples of rinse water will be analyzed for pH and parameters of waste stored to insure area and concrete floor are decontaminated. Since any spill or leaks from containers are routinely cleaned up during normal operation, minimal cleaning will be required.

Drums are stored in an enclosed building with concrete floor and curbing with no outlet, so no liquids can escape to ground.

- C. Type of Drum Waste Stored - Total Maximum 195 55-gallon drums.

D001	Ignitable
D002	Corrosive
D003	Reactive
D007	EP Toxic (chromium)
D009	EP Toxic (mercury)
F001	Spent Halogenated Solvents

265.112 Closure Plan

A. Written Plan

- 1. The drum storage areas will be closed within 90 days after receiving the final volume of hazardous waste.
- 2. The maximum estimated inventory of hazardous waste in storage at any time is 195 55-gallon drums, as indicated above.

PARKER CHEMICAL COMPANY

Madison Heights, Michigan

Closure Plan - MID057676124

Part 265

Subpart G

Closure and Post-Closure

265.112 Closure Plan

A. Written Plan

3. Drums of hazardous waste will be removed from storage by a licensed disposal agent within 90 days after the date of receiving the final volume of hazardous waste.

4. All drum storage areas will be cleaned and decontaminated of any hazardous waste within 180 days after closure. The storage area, approximately 18'x25', will be cleaned as per Section 265.111 above. Site cleanup will be minimal since wastes are contained in drums. Any leaks or spills are immediately cleaned up using absorbant.

All wastewater and residues generated during cleanup of the site will be analyzed to see if waste is hazardous. If this waste is hazardous, it will be removed by a licensed disposal agent. If analysis indicates no evidence of hazardous materials, the wastewater/residues will be discharged to the chemical wastewater system which discharges to the municipal sewer.

5. Hazardous waste sampling methods will be conducted in accordance with procedures outlined in "Test Methods for Evaluating Solid Waste" Section 1.2 (SW-846).
6. Parameters and test methods will be conducted in accordance with procedures outlined in "Test Methods for Evaluating Solid Waste", U.S. EPA Manual SW-846.

7. Closure Schedule:

- | | |
|------------------------------------------------------------------------|----------|
| a. Receipt of final load of waste | Day 0 |
| b. Disposal of final inventory of drummed waste | 90 days |
| c. Decontamination of storage area | 150 days |
| d. Laboratory analysis of washings | 160 days |
| e. EPA/MDNR approval of closure requirements | 170 days |
| f. Completion of Closure and Certification
submitted to MDNR (EPA). | 180 days |

PARKER CHEMICAL COMPANY

Madison Heights, Michigan

Closure Plan - MID057676124

Part 265

Subpart G

Closure and Post-Closure

265.112 Closure Plan

B. Amendment of Closure Plan

Any changes in the closure plan during the active life of the facility will result in an amended closure plan. Such amended plan will be amended within 60 days of the day of any change affecting the closure of the hazardous waste storage facility.

C. Submittal of Closure Plan

Parker Chemical Company will submit a closure plan to the Regional Administrator at least 45 days before beginning closure of the container storage area.

265.113 Time Allowed for Closure

Within 150 days from the date of receiving the final volume of hazardous wastes, the Madison Heights storage areas will be decontaminated and ready for closure.

265.114 Disposal or Decontamination of Equipment

All equipment will be decontaminated (see Section 265.111).

265.115 Certification of Closure

When closure is completed, the owner or operator will submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan (see Attachment I).

265.116-

265.120 Applies only to disposal facilities. Does not apply to the Madison Heights facility.

NATURAL RESOURCES
COMMISSION

LARRY DEVUYST
PAUL EISELE
GORDON E. GUYER
JAMES P. HILL
DAVID HOLLI
O. STEWART MYERS
JOEY M. SPANO

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

Stevens T. Mason Building, P.O. Box 30028, Lansing, MI 48909

ROLAND HARMES, Director

cc: J. Federico
J. Hoff
Resd 11/30/92
Compliance File

September 24, 1992

Mr. Jack Garavanta
Regulatory Affairs Manager
Henkel Corporation - Parker+Amchem
32100 Stephenson Highway
Madison Heights, Michigan 48071

Dear Mr. Garavanta:

SUBJECT: Release from Financial Capability Requirements for
Closure of Hazardous Waste Container Storage Areas
Henkel Corporation - Parker+Amchem
MID 057 676 124

The Michigan Department of Natural Resources has completed a review of the closure certification for the Henkel Corporation - Parker+Amchem Madison Heights facility, pursuant to the Michigan Hazardous Waste Management Act, 1979 P.A. 64, as amended (Act 64). Based upon the closure certification received May 18, 1992, and the additional documentation submitted September 9, 1992, Henkel Corporation - Parker+Amchem is hereby released from the financial capability requirements for closure and liability coverage under Part 7 of the Act 64 Rules for the Madison Heights facility. Henkel Corporation - Parker+Amchem is therefore no longer required to demonstrate financial responsibility for liability coverage using the financial test and no longer required to demonstrate financial assurance for closure of this facility using the Letter of Credit (LOC). Staff are currently evaluating amendments received to LOC No. 599312, and will respond shortly in that regard.

This release of financial capability requirements for the closure of the hazardous waste container storage areas at the Madison Heights facility does not release Henkel Corporation - Parker+Amchem from any corrective action responsibilities under the Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984.

DEC 20 1989

5RA-14

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert V. Fabrizio
Letter of Credit Department, F.C. 2-10-49
Philadelphia National Bank
P.O. Box 13866
Philadelphia, Pennsylvania 19101-3866

Dear Mr. Fabrizio:

The United States Environmental Protection Agency is in receipt of your July 18, 1989, letter requesting approval of the cancellation of Irrevocable Standby Letter of Credit No. 594631 in the amount of \$74,979 for the Henkel Corporation. Since a new letter of credit, covering the same facilities, was issued to the Director, Michigan Department of Natural Resources, on August 1, 1989, Irrevocable Standby Letter of Credit No. 594631 is hereby returned and approved for cancellation.

If you have any questions or desire additional information, please contact Mr. Ronald Brown in the Waste Management Division, at (312) 886-4463.

Sincerely yours,

Valdas V. Adamkus
Regional Administrator

Enclosure

cc: John E. Knudson, Henkel Corporation
Lonnie Lee, MDNR-Jackson
Ben Okwumabua, MDNR-Northville
John Bohunsky, MDNR-Lansing w/o enclosure
5HR-12:R. BROWN:ev:12/12/89:DISK #3:PC FILENAME:FABRIZIO

REG.	
ADM.	

INIT. DATE	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/IN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O. R. A.D.D.	WMD DIR
	E-V	PEB				P.E.D. 12-14-89		WEM 12/15/89	DAY 12/19/89	DAY 12/19/89

5RA
any
12/20/89

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: DEC 19 1989

SUBJECT: Cancellation of Irrevocable Standby
Letter of Credit No. 594631 for the
Henkel Corporation

FROM: Basil G. Constantelos, Director
Waste Management Division

TO: Valdas V. Adamkus
Regional Administrator

Attached for your signature is a letter returning the original of Irrevocable Standby Letter of Credit No. 594631 in the amount of \$74,979 for the Henkel Corporation. Irrevocable Standby Letter of Credit No. 564631 was issued to the Regional Administrator of Region V, United States Environmental Protection Agency, on March 30, 1988. As part of the authorization of the Michigan hazardous waste program under the Resource Conservation and Recovery Act, the beneficiary of financial instruments is to be changed to the Director, Michigan Department of Natural Resources (MDNR). A new letter of credit, covering the same facilities, was issued to the Director, MDNR, on August 1, 1989.

If you have any questions, please contact Ronald Brown of my staff at 886-4463.

R.BROWN:ev:12/12/89:Disk #2:PC FILENAME:HC

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/NI TECH. ENF. SEC.	CHIEF ENF. SEC.	RCRA ENF. DR. CHIEF	O.R. A.D.D.	WMD DIR
INIT. DATE	EV- 12-15	REB 12-15-89				WEN 12/15/89	DAV 12/19/89	DAV 12/19/89

ap 12/15/89
cm 12/18/89
EA
12-19-89

NATIONAL BANK

1 North 5th Street
Philadelphia PA 19106

-3886

☐ We have debited
your Account/
H. O. Account

CABLE ADDRESS: PHILABANK TELEX: 4890118

IRREVOCABLE DOCUMENTARY CREDIT

ACCOUNT NUMBER	
\$	
Confirmation commission	AMOUNT
\$	\$

COPY FOR YOUR RECORDS

DIRECTOR
DEPARTMENT OF NATURAL RESOURCES
P. O. BOX 30028
LANSING, MI 48909

AIR
MAIL
TO

DIRECTOR, DEPARTMENT OF NATURAL RESOURCES

1. WE HEREBY ISSUE OUR IRREVOCABLE LETTER OF CREDIT NO. 596251 IN YOUR FAVOR ON BEHALF OF HENKEL OF AMERICA, INC., HEREINAFTER KNOWN AS THE COMPANY, FOR A SUM OF \$77,679.00 (SEVENTY-SEVEN THOUSAND SIX HUNDRED SEVENTY-NINE AND 00/100 U.S. DOLLARS) AVAILABLE BY YOUR DRAFT(S) AT SIGHT DRAWN ON OUR INSTITUTION, THE PHILADELPHIA NATIONAL BANK, MARKED "DRAWN UNDER PHILADELPHIA NATIONAL BANK LETTER OF CREDIT NO. 596251" DATED TODAY'S DATE. WE ARE A BANK OR FINANCIAL INSTITUTION WHICH HAS THE AUTHORITY TO ISSUE LETTERS OF CREDIT. OUR LETTER OF CREDIT OPERATIONS ARE REGULATED AND EXAMINED BY THE COMPTROLLER OF CURRENCY.
2. THIS LETTER OF CREDIT IS ISSUED TO PROVIDE FINANCIAL ASSURANCE TO THE STATE OF MICHIGAN, DEPARTMENT OF NATURAL RESOURCES FOR CLOSURE OF THE HAZARDOUS WASTE TREATMENT AND STORAGE FACILITIES KNOWN AS HENKEL CORPORATION AND PARKER + AMCHEM, EPA ID #MID057676124 AND MID58723867, AND LOCATED AT MADISON HEIGHTS AND MORENCI, MICHIGAN.
Detroit *Jackson*
3. THIS LETTER OF CREDIT SHALL BE AUTOMATICALLY EXTENDED FOR A PERIOD OF AT LEAST ONE YEAR UNLESS, NOT LESS THAN 120 DAYS BEFORE THE CURRENT EXPIRATION DATE, WE NOTIFY BOTH THE OWNER OR OPERATOR AND THE DIRECTOR BY CERTIFIED MAIL OF OUR DECISION NOT TO EXTEND THE EXPIRATION DATE. WE AGREE THAT THE 120 DAY PERIOD SHALL BEGIN ON THE DATE WHEN BOTH THE OWNER OR OPERATOR AND THE DIRECTOR HAVE RECEIVED THE NOTICE, AS EVIDENCED BY THE RETURN RECEIPTS.
4. THE DIRECTOR OR HIS AUTHORIZED REPRESENTATIVE MAY DRAW ON THIS LETTER OF CREDIT IN THE EVENT THAT THE DIRECTOR OF THE DEPARTMENT OF NATURAL RESOURCES, IN ACCORDANCE WITH THE ADMINISTRATIVE RULES PROMULGATED UNDER 1979 PA 64, AS AMENDED, ISSUES A NOTICE OF VIOLATION OR OTHER ORDER INDICATING THAT THE COMPANY HAS FAILED TO PROPERLY EXECUTE ITS CLOSURE RESPONSIBILITIES AND SHALL DRAW ON THIS LETTER OF CREDIT IN THE EVENT THAT THE COMPANY FAILS TO PROVIDE THE DIRECTOR WITH AN EXTENSION OF THIS LETTER OF CREDIT, AN ACCEPTABLE REPLACEMENT LETTER OF CREDIT OR ANOTHER TYPE OF FINANCIAL ASSURANCE ACCEPTABLE TO THE DIRECTOR WITHIN 90 DAYS AFTER RECEIPT BY BOTH THE OWNER OR OPERATOR AND THE DIRECTOR OF A NOTICE FROM US THAT WE HAVE DECIDED NOT TO EXTEND THE LETTER OF CREDIT BEYOND ITS CURRENT EXPIRATION DATE.
5. PARTIAL DRAWINGS ARE PERMITTED. THIS ORIGINAL LETTER OF CREDIT MUST BE SUBMITTED TO US TOGETHER WITH ANY DRAWINGS HEREUNDER FOR OUR ENDORSEMENT OF ANY PAYMENTS EFFECTED BY US AND/OR FOR CANCELLATION.
6. THIS LETTER OF CREDIT IS SUBJECT TO THE UNIFORM COMMERCIAL CODE OF THE STATE OF MICHIGAN.

...(SEE CONTINUATION)...

reStates

Philadelphia
National BankInternational Divi
PO Box 13888
1 North 5th Street
Philadelphia PA 19101-3888☐ To be collected
at negotiation.☐ We have debited
your Account/
H. O. Account

L/C CO.

ACCOUNT NUMBER

\$

Confirmation commission

AMOUNT

\$

\$

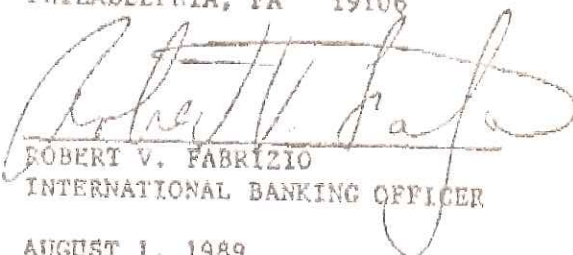
TELE ADDRESS: PHILABANK TELEX: 4990118

IRREVOCABLE DOCUMENTARY CREDIT

COPY FOR YOUR RECORDS

ATTACHED TO AND FORMING PART OF DOCUMENTARY CREDIT NO. 596251 DATE: AUGUST 1, 1989
PAGE TWOAIR
MAIL
TO

7. WE GUARANTEE TO DRAWERS AND/OR BONA FIDE HOLDERS THAT DRAFTS DRAWN IN CONFORMITY WITH THE TERMS OF THIS CREDIT WILL BE DULY HONORED UPON PRESENTATION IF PRESENTED ON OR AFTER AUGUST 1, 1989 AND ON OR BEFORE JULY 31, 1990. THE AMOUNT OF EACH DRAFT MUST BE ENDORSED ON THE REVERSE OF THIS LETTER OF CREDIT BY THE NEGOTIATING BANK.

PHILADELPHIA NATIONAL BANK
ONE NORTH FIFTH STREET
PHILADELPHIA, PA 19106
ROBERT V. FABRIZIO
INTERNATIONAL BANKING OFFICER

AUGUST 1, 1989

KPMG Peat Marwick

Certified Public Accountants

Peat Marwick Main & Co.

1600 Market Street
Philadelphia, PA 19103Telephone 215 299 3100
Telex 4973852

Telecopier 215 299 3150

Independent Auditor's ReportThe Board of Directors
and Shareholders
Henkel of America, Inc.

We have audited, in accordance with generally accepted auditing standards, the consolidated balance sheets of Henkel of America, Inc. and United States subsidiaries as of and for the year ended December 31, 1988 and the related consolidated statement of income for the year ended, and have issued our report thereon dated March 31, 1989.

In connection with our audit, we have compared the data in the August 28, 1989 Financial Certification Letter from Mr. Knudson, the Chief Financial Officer of Henkel of America, Inc., appearing on lines 2 through 6, with the amounts in the financial statements referred to above.

On the basis of this comparison, no matters came to our attention which caused us to believe that the specified data should be adjusted.

This report is intended solely for the information and use of the board of directors and management of Henkel of America, Inc. and the interested governmental agencies and should not be used for any other purpose.

Peat Marwick Main & Co

August 28, 1989

Member Firm of
Klynveld Peat Marwick Goerdeler

The Henkel logo, consisting of the word "Henkel" in a bold, sans-serif font, enclosed within an oval border.**Henkel Corporation**

August 28, 1989

Letter from Chief Financial Officer

Director
Department of Natural Resources
P.O. Box 30028
Lansing, MI 48909

Re: MID057676124
MID058723867

Dear Sir or Madam:

I am the Chief Financial Officer of Henkel Corporation, 2200 Renaissance Blvd., Suite 200, Gulph Mills, PA 19406. This letter is in the support of this firm's use of the financial test to demonstrate financial responsibility for liability insurance coverage as specified in Part 7 of the Act 64 Administrative Rules and 40 CFR Section 264.147(f).

The firm identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart 1 of 40 CFR Part 264:

Henkel Corporation
Parker+Amchem
32100 Stephenson Highway
Madison Heights, MI
MID057676124

Henkel Corporation
Parker+Amchem
322 West Main Street
Morenci, MI
MID058723867

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

Department of Natural Resources
August 28, 1989
Page 2

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk (*) are derived from this firm's independently audited, year-end financial statements for the latest fiscal year, ended December 31, 1988.

1.	Amount of annual aggregate liability coverage to be demonstrated	\$ 2,000,000		
*2.	Current assets	\$216,098,000		
*3.	Current liabilities	\$132,095,000		
4.	Net working capital (line 2 minus line 3)	\$ 84,003,000		
*5.	Tangible net worth	\$468,646,000		
*6.	If less than 90% of firm's assets are located in the U.S., give total U.S. assets	\$ > 90%		
		<u>Yes</u>	<u>No</u>	
7.	Is line 5 at least \$10 million?	<u>X</u>	<u> </u>	
8.	Is line 4 at least 6 times line 1?	<u>X</u>	<u> </u>	
9.	Is line 5 at least 6 times line 1?	<u>X</u>	<u> </u>	
*10.	Are at least 90% of firm's assets located in the U.S.? If not, complete line 11.	<u>X</u>	<u> </u>	
11.	Is line 6 at least 6 times line 1?			N/A

I hereby certify that the wording of this letter is identical to the wording of the model letter specified by

Department of Natural Resources
August 28, 1989
Page 3

the Director for the financial test related to liability insurance coverage as such letter was specified on the date shown immediately below.


Signature

Name: John E. Knudson
Title: Chief Financial Officer
Date: August 28, 1989

/p9

58/UN082689.LTR



International Division
PO Box 13866
1 North 5th Street
Philadelphia PA 19101-3866

- ☐ To be collected
at negotiation.
- ☐ We have debited
your Account/
H. O. Account

L/C COMM.	ACCOUNT NUMBER
\$	
Confirmation commission	AMOUNT
\$	\$

CABLE ADDRESS: PHILABANK TELEX: 4990118

IRREVOCABLE DOCUMENTARY CREDIT

AMENDMENT TO DOCUMENTARY CREDIT

ORIGINAL

OUR CREDIT NO

594631

CR NO ADVISING BK

DATE

JULY 18, 1989

MC:dz

ADVISED VIA:

X AIRMAIL

MAIL
TO

BENEFICIARY

US EPA REGION V
ATTN: REGIONAL ADMINISTRATOR
230 SOUTH DEARBORN STREET
CHICAGO, IL 60604

APPLICANT

HENKEL CORPORATION
THE TRIAD, SUITE 200
2200 RENAISSANCE BLVD.
GULPH MILLS, PA 19406

Gentlemen:

The above mentioned Credit is amended as follows:

(PLEASE BE GUIDED BY THE CLAUSES MARKED "X".)

X Beneficiary must show their approval to this amendment by signing attached copy and returning it to the Philadelphia National Bank, Attention: Robert Fabrizio, Letter of Credit Department, F.C. 2-10-49

X The evergreen language is deleted and this letter of credit is now cancelled.

THIS AMENDMENT IS TO BE CONSIDERED AS PART OF THE ABOVE CREDIT & MUST BE ATTACHED THERETO.
ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

EXCEPT SO FAR AS OTHERWISE EXPRESSLY STATED, THIS DOCUMENTARY CREDIT IS SUBJECT TO THE
"UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS" (1983 REVISION), INTERNATIONAL
CHAMBER OF COMMERCE, PUBLICATION 400.


AUTHORIZED SIGNATURE

RECEIVED
JUL 25 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V


Henkel Corporation
O: WMD
CC: RF
RECEIVED

APR 04 1988

March 31, 1988

Regional Administrator
U.S. EPA Region V
230 South Dearborn Street
Chicago, IL 60604

SENT VIA AIRBORNE EXPRESS
U.S. EPA, REGION V
HAZARDOUS WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

RE: Hazardous Waste Management Financial Assurance Filing
Parker Chemical Company
Madison Heights, MI
MID057676124
Morenci, MI
MID058723867

Dear Sir:

Enclosed find the following document pertaining to the hazardous waste management financial assurance filing for the referenced facilities:

1. Letter of Credit #594631, issued by Philadelphia National Bank on March 30, 1988 in the amount of \$74,979 to demonstrate financial assurance for closure of the referenced facilities whose full address is as follows:

Parker Chemical Company
T/A Henkel Corporation
Parker+Amchem
32100 Stephenson Highway
Madison Heights, MI 48071

Parker Chemical Company
T/A Henkel Corporation
Parker+Amchem
322 West Main Street
Morenci, MI 49256

Demonstration of financial responsibility for bodily injury and property damage to third parties caused by sudden and accidental occurrences arising from operations of the facilities will be provided within the next two weeks, or as soon as our consolidated financial statement as of December 31, 1987 becomes available.

Very truly yours,

Juliette Richter
Juliette Richter
Associate General Counsel

RECEIVED

APR 04 1988

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

JR/mme
Encl.

L.MIFAF/#1

Current Closure Cost Estimates

Henkel Corporation	Total:	\$74,979
The Triad, Suite 200		
2200 Renaissance Blvd.		
Gulph Mills, PA 19406		

Industrial Establishment: Madison Heights facility

Parker Chemical Company	\$29,767
T/A Henkel Corporation	
Parker+Amchem	
32100 Stephenson Highway	
Madison Heights, MI 48071	
MIDO57676124	

Industrial Establishment: Morenci facility

Parker Chemical Company	
T/A Henkel Corporation	
Parker+Amchem	
322 West Main Street	
Morenci, MI 49256	\$45,212
MIDO58723867	



International Division
PO Box 13866
Philadelphia PA 19101-3866

- ☐ To be collected
at negotiation.
- ☐ We have debited
your Account/
H. O. Account

CABLE ADDRESS: PHILABANK TELEX: 4990118

IRREVOCABLE DOCUMENTARY CREDIT

L/C COMM.	ACCOUNT NUMBER
Confirmation commission	AMOUNT

ORIGINAL

DATE: MARCH 30, 1988

IRREVOCABLE STANDBY LETTER OF CREDIT NO. 594631

US EPA REGION V

ATTN: REGIONAL ADMINISTRATOR

230 SOUTH DEARBORN STREET

CHICAGO, IL 60604

DEAR SIR OR MADAM:

WE HEREBY ESTABLISH OUR IRREVOCABLE STANDBY LETTER OF CREDIT NUMBER 594631 IN YOUR FAVOR, AT THE REQUEST AND FOR THE ACCOUNT OF HENKEL CORPORATION, THE TRIAD, SUITE 200, 2200 RENAISSANCE BLVD., GULPH MILL, PA. 19406 UP TO THE AGGREGATE AMOUNT OF USD74,979.00 (U.S. DOLLARS SEVENTY FOUR THOUSAND, NINE HUNDRED SEVENTY NINE AND NO CENTS) AVAILABLE UPON PRESENTATION BY YOU OF YOUR SIGHT DRAFT DRAWN ON THE PHILADELPHIA NATIONAL BANK MARKED "DRAWN UNDER PHILADELPHIA NATIONAL BANK IRREVOCABLE STANDBY LETTER OF CREDIT NUMBER 594631" AND ACCOMPANIED BY:

- 1.) YOUR SIGNED STATEMENT READING AS FOLLOWS: "I CERTIFY THAT THE AMOUNT OF THE DRAFT IS PAYABLE PURSUANT TO REGULATIONS ISSUED UNDER AUTHORITY OF THE MICHIGAN HAZARDOUS WASTE MANAGEMENT ACT (ACT 64)."

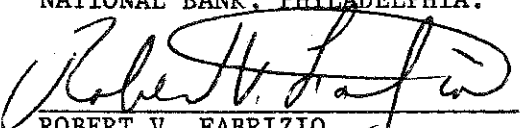
THIS LETTER OF CREDIT IS EFFECTIVE AS OF MARCH 30, 1988 AND SHALL EXPIRE ON MARCH 30, 1989, BUT SUCH EXPIRATION DATE SHALL BE AUTOMATICALLY EXTENDED FOR A PERIOD OF ONE (1) YEAR ON EACH SUCCESSIVE EXPIRATION DATE, UNLESS AT LEAST 120 DAYS BEFORE THE CURRENT EXPIRATION DATE, WE NOTIFY BOTH YOU AND HENKEL CORPORATION BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED, THAT WE HAVE DECIDED NOT TO EXTEND THIS LETTER OF CREDIT BEYOND THE CURRENT EXPIRATION DATE. IN THE EVENT YOU ARE SO NOTIFIED, ANY UNUSED PORTION OF THE CREDIT SHALL BE AVAILABLE UPON PRESENTATION OF YOUR SIGHT DRAFT WITHIN THE VALIDITY OF THIS CREDIT AFTER THE DATE OF RECEIPT BY BOTH YOU AND HENKEL CORPORATION, AS SHOWN ON THE SIGNED RETURN RECEIPTS.

WHENEVER THIS LETTER OF CREDIT IS DRAWN ON UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS CREDIT, WE SHALL DULY HONOR SUCH DRAFT UPON PRESENTATION TO US.

WE ENGAGE WITH YOU THAT ALL DOCUMENTS PRESENTED IN COMPLIANCE WITH THE TERMS OF THIS LETTER OF CREDIT WILL BE DULY HONORED BY US IF DELIVERED TO OUR LETTER OF CREDIT DEPARTMENT LOCATED AT ONE NORTH FIFTH STREET, TENTH FLOOR, PHILADELPHIA, PA 19106 PRIOR TO 3 P.M. ON OR BEFORE THE EXPIRATION DATE.

EXCEPT SO FAR AS OTHERWISE EXPRESSLY STATED, THIS DOCUMENTARY CREDIT IS SUBJECT TO THE "UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS: (1983 REVISION), INTERNATIONAL CHAMBER OF COMMERCE, PUBLICATION NO. 400.

THIS LETTER OF CREDIT IS AVAILABLE BY SIGHT PAYMENT AT THE COUNTERS OF THE PHILADELPHIA NATIONAL BANK, PHILADELPHIA.


ROBERT V. FABRIZIO
INTERNATIONAL BANKING OFFICER
DATE: MARCH 30, 1988



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5hE-12

MAR 26 1987

U.S. EPA ID #: M10007678124

PARKER CHEM CO
32100 STEPHENSON HIGHWAY
MADISON HEIGHTS MI 48071

Re: RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

To implement this aspect of authorization, financial documents must be written to satisfy the requirements of the Michigan Administrative Code 1985 AACs, Part 7, which is the Michigan equivalent of 40 CFR Part 265, Subpart H. This letter is to notify you that your corporate guarantee should be updated and sent to the Director of the Michigan Department of Natural Resources within 90 days after the close of your fiscal year.

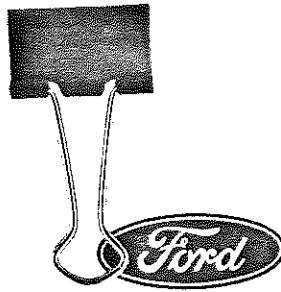
If you have any questions or desire additional information, please contact Ms. Sharon Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

Wm. E. Muno

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR



Ford Motor Company

RECEIVED

APR 1 1986

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

The American Road
P.O. Box 1899
Dearborn, Michigan 48121

March 27, 1986

Regional Administrator
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, IL 60604

Dear Sir:

Subject: Hazardous Waste Management Financial Assurance Filings

Enclosed are the documents required for the annual hazardous waste management financial assurance filing, including a letter from the Chief Financial Officer, an audited annual report, and a special report from the independent CPA on the financial data in the letter. Copies of Form 10-K filed with the Securities and Exchange Commission are not yet available. I will send the 10-K report to you as soon as possible.

If you have any questions, please call me at (313) 322-9762.

Sincerely,

D. L. Fitzgerald
Corporate Insurance Department

Enclosures
(32A-11)

cc: WMD ✓
cc: RF (Ltr.)

cc: RF

MID 057 676 124



Ford Motor Company

RECEIVED

The American Road
P.O. Box 1889
Dearborn, Michigan 48121

March 29, 1985

WILLIAM H. HUNT
CHIEF

Regional Administrator
U.S. EPA, Region V
230 S. Dearborn St.
Chicago, IL 60604

*ADDITIONAL INFORMATION
IS FILED WITH
MID 980 568 711*

Dear Sir:

Subject: Hazardous Waste Management Financial Assurance Filings

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Sincerely,

A. D. Hagerty

A. D. Hagerty
Corporate Insurance Department

Enclosures
(23-EN1)



Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

September 29, 1983

Chief
Hazardous Waste Management Branch
California State Department of
Health Services
744 P Street
Sacramento, CA 95814

Regional Administrator
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Commissioner
New Jersey Department of
Environmental Protection
32 E. Hanover Street, CN027
Trenton, New Jersey 08625

Region Administrator
U.S. EPA, Region VII
324 East Eleventh Street
Kansas City, MO 64106

Subject: Hazardous Waste Management Financial Requirements

I am the chief financial officer of Ford Motor Company, the American Road, Dearborn, Michigan 48121. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: